

JASON M. WILEY, ESQ.
Nevada Bar No. 09274
RYAN S. PETERSEN, ESQ.
Nevada Bar No. 10715
WILEY PETERSEN
1050 Indigo Drive, Suite 200B
Las Vegas, Nevada 89145
Telephone: 702.910.3329
Facsimile: 702.553.3467
jwiley@wileypetersenlaw.com
rpetersen@wileypetersenlaw.com

Timothy M. Hartley, Esq.
(*PRO HAC VICE*)
HARTLEY LAW OFFICES, PLC
12 Southeast Seventh Street, Suite 610
Fort Lauderdale, Florida 33301
Telephone: (954) 357-9973
Fax: (954) 357-2275
hartley@hartleylaw.net

*Attorneys for Plaintiffs Valley Health Systems, LLC
DVH Hospital Alliance, LLC and
Summerlin Hospital Medical Center, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VALLEY HEALTH SYSTEM, LLC, a Delaware
Limited Liability company, DVH HOSPITAL
ALLIANCE, LLC, a Delaware Limited Liability
company, and SUMMERLIN HOSPITAL
MEDICAL CENTER, LLC, a Delaware Limited
Liability company,

Plaintiffs,

vs.

TRAVEL INSURANCE FACILITIES, PLC, a
Foreign Corporation, UNION
REISEVERSICHERUNG
AKTIENGESellschaft, a Foreign
Corporation,

Defendants.

CASE NO.: 2:22-CV-00365-ART-DJA

**PLAINTIFF'S LOCAL RULE IA 6-1.
MOTION FOR ENLARGEMENT OF
TIME TO EFFECTUATE SERVICE**

COME NOW, Plaintiffs, Valley Health System, LLC, DVH Hospital Alliance, LLC, and
Summerlin Hospital Medical Center, LLC, (collectively, "Plaintiffs"), by and through their

undersigned counsel, and, pursuant to Local Rule 6-1 hereby move this Honorable Court for an enlargement of time for an additional sixty (60) days through and including January 23, 2023 within which to effectuate service of the Summons, Complaint and Standing Order upon Defendant, TRAVEL INSURANCE FACILITIES, PLC, a Foreign Corporation, and state as follows:

1. Since the filing of the Complaint, the Plaintiff has attempted to obtain Article 5 service of the Summons, Amended Complaint and Standing Order on Defendant, TRAVEL INSURANCE FACILITIES, PLC, a Foreign Corporation (“TIF”), through the Hague Convention.

2. The undersigned is making another attempt at serving the Defendant, TIF after obtaining a new summons removing Jonathon Phillips as the representative for Defendant, TIF. The Summons, Amended Complaint and Standing Order are in transit to the Royal Courts of Justice for service through Article 5 of the Hague Convention. A true and correct copy of the most recent correspondence with the Foreign Process Section of the Hague Convention attesting to the Plaintiffs’ efforts to obtain service on TIF through Article 5 of the Hague Convention is attached to this Motion as *Exhibit A*.

3. While Fed.R.Civ.P. 4(m) requires service within 90 days after filing of a Complaint, subdivision (m) does not apply to service in a foreign country under [Rule 4\(f\)](#) or [4\(h\)\(2\)](#), the provisions under which the Plaintiff is attempting to obtain service on the Defendants in this action.

4. Nevertheless, in an abundance of caution and in the interests of judicial economy, the Plaintiff requests an additional sixty (60) days to obtain service of the Summons and Amended Complaint upon the Defendant, TIF and respectfully requests this Honorable Court enter its Order enlarging the time to effectuate service accordingly.

5. This Motion is made in good faith and not for the purposes of harassment or delay.

6. The undersigned has contacted counsel for the Defendant has no objection to the filing of this Motion or the relief sought herein.

WHEREFORE, for the foregoing reasons, Plaintiffs, Valley Health System, LLC, DVH Hospital Alliance, LLC, and Summerlin Hospital Medical Center, LLC, respectfully request an additional sixty (60) days through and including January 23, 2023, in which to effectuate service of

Summons and Amended Complaint upon the Defendant, TIF as aforesaid and for such other and further relief as the Court deems appropriate.

DATED this 22nd day of November, 2022.

WILEY PETERSEN

/s/ Jason M. Wiley

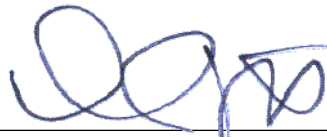
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*Attorneys for Plaintiffs Valley Health
Systems, LLC, DVH Hospital
Alliance, LLC and Summerlin
Hospital Medical Center, LLC*

Having reviewed Plaintiffs' motion, the Court finds good cause to extend the time for service.

IT IS THEREFORE ORDERED that Plaintiffs' motion for an extension of time (ECF No. 44) is **GRANTED**. Plaintiffs shall have until **January 23, 2023** to effectuate service on Defendant Travel Insurance Facilities, PLC.



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: November 23, 2022

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Hartley Law Offices, PLC, and that on the 22nd day of November, 2022, I caused to be served a true and correct copy of the foregoing **PLAINTIFF'S LOCAL RULE IA 6-1. MOTION FOR ENLARGEMENT OF TIME TO EFFECTUATE SERVICE** in the following manner:

(ELECTRONIC SERVICE) Pursuant to Rule 5-4 of the Local Rules of Civil Practice of the United States District Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

(UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties listed below at their last-known mailing addresses, on the date above written.

(ELECTRONIC E-MAIL)

Pat Lundvall (NSBN 3761)
Daniel Aquino (NSBN 12682)
McDONALD CARANO LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
Telephone: (702) 873-4100
lundvall@mcdonaldcarano.com
daquino@mcdonaldcarano.com
*Attorneys for Defendants Travel Insurance Facilities, PLC
and Union Reiseversicherung Aktiengesellschaft*

/s/Timothy M. Hartley, Esq.

HARTLEY LAW OFFICES, PLC

From: Yanique Reid
To: Foreign Process (RCJ)
Cc: Tim Hartley
Subject: RE: QF-2022-004875;RE: Status of Service- Valley Health v. TIF*****Update Requested*****
Date: Wednesday, November 16, 2022 11:27:00 AM
Attachments: All - Req for Foreign service Process - UK - TIF 11-3-22.pdf
issued - Third Summons to TIF 11-3-2022.pdf
Importance: High

Good Day Ms. Hartshorne-

We sent another delivery to you via FedEx (**UK Tracking number 815309845008**) and the security at the gate refused to give the FedEx driver access to deliver the package this morning. Please be aware that FedEx will attempt delivery of the attached documents within 24 hours and I have provided your phone number for FedEx to give you a call for this delivery.

Our office has a deadline approaching to obtain service on the Defendant, TIF and I would appreciate any assistance on your office's part with the acceptance of our FedEx delivery and service of process on the Defendant. Please feel free to contact me via email with any updates on the status of this service. Thank you.

Yanique S. Reid

Paralegal to Timothy M. Hartley, Esq.

Hartley Law Offices, PLLC

12 Southeast Seventh Street, Suite 610
Fort Lauderdale, FL 33301 U.S.A
t: 954.357.9973
f: 954.357.2275
reid@hartleylaw.net
www.hartleylaw.net

From: Hartshorne, Tatyana <Tatyana.Hartshorne1@Justice.gov.uk> **On Behalf Of** Foreign Process (RCJ)

Sent: Tuesday, October 4, 2022 5:45 AM

To: Yanique Reid <reid@hartleylaw.net>

Subject: RE: QF-2022-004875;RE: Status of Service- Valley Health v. TIF*****Update Requested*****

Dear Yanique

Thank you for your email.

I would like to note that due to the regulation that the Foreign Process Section have to follow, method of service you required must be ticked.

If you wish to serve a company, please, state the name of the company (without the

name of representative) and tick box a). In this case, bailiff will serve documents using any available method of service at the company's address.

Please provide a fresh request form and 2 sets of documents and we will do our best in order to serve your documents.

Kind Regards

Tatyana Hartshorne
Administrative Officer
Foreign Process Section |
HMCTS Royal Courts of Justice London WC2A 2LL
Phone: 0203 936 8957 Option 7

Web: www.gov.uk/hmcts

For information on how HMCTS uses personal data about you please see:

<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

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**We must
keep on protecting
each other.**



HANDS



FACE



SPACE

From: Yanique Reid <reid@hartleylaw.net>

Sent: 22 September 2022 17:11

To: Foreign Process (RCJ) <foreignprocess.rcj@Justice.gov.uk>

Cc: Tim Hartley <hartley@hartleylaw.net>

Subject: RE: QF-2022-004875; RE: Status of Service- Valley Health v. TIF*****Update Requested*****

Good Day Tatyana-

I just wanted to clarify that our summons was for service on the entity, Travel Insurance Facilities, PLC itself. Jon Phillips is just a representative of the company and his name was placed on the summons per the Hague's instruction. Service of this summons could have been effectuated on anyone legal authorized to accept service on behalf of Travel Insurance Facilities, PLC and not necessarily Jon Phillips personally.

Yanique S. Reid

Paralegal to Timothy M. Hartley, Esq.

Hartley Law Offices, PLC

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Fort Lauderdale, FL 33301 U.S.A
t: 954.357.9973
f: 954.357.2275
reid@hartleylaw.net
www.hartleylaw.net

From: Hartshorne, Tatyana <Tatyana.Hartshorne1@Justice.gov.uk> **On Behalf Of** Foreign Process (RCJ)

Sent: Thursday, September 22, 2022 10:13 AM

To: Yanique Reid <reid@hartleylaw.net>

Subject: RE: QF-2022-004875;RE: Status of Service- Valley Health v. TIF*****Update Requested*****

Dear Yanique

Thank you for your email.

I would like to inform you that the documents were sent for personal service on Mr Jon Phillips at his workplace as it stated in the request form that you have provided.

Bailiff were unable to meet the person, therefore, documents returned unserved. A certificate of non-service will be issued in due course.

Kind regards

Tatyana Hartshorne
Administrative Officer
Foreign Process Section |
HMCTS Royal Courts of Justice London WC2A 2LL
Phone: 0203 936 8957 Option 7

Web: www.gov.uk/hmcts

For information on how HMCTS uses personal data about you please see:

<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

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**We must
keep on protecting
each other.**



HANDS



FACE



SPACE

From: Yanique Reid <reid@hartleylaw.net>

Sent: 13 September 2022 19:06